

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
TENNESSEE

OLYMPIC STEAKHOUSE	)	
	)	
Plaintiffs	)	
	)	
v.	)	No.: 1:23-cv-02191-JDB-jay
	)	
WESTERN WORLD INSURANCE GROUP,	)	
STEVE NASH AND J & S HELD LLC	)	
	)	
Defendants	)	

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**MOTION TO REMAND AND FOR ATTORNEY FEES AND EXPENSES**

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COMES NOW THE PLAINTIFFS, by and through undersigned counsel, and pursuant to 28 USC 1447 and move this Court to remand this matter to state court and for the payment of fees of expenses and would show this Court the following:

Please see the attached Memorandum

Plaintiff consulted with the Defendant regarding this Motion and the Defendant could not consent to same.

WHEREFORE PLAINTIFF REQUEST THE COURT to grant the Plaintiff's Motion for remand and to award fees and expenses.

Respectfully submitted,

/s/Drayton D. Berkley  
Drayton D. Berkley, Esq.  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon the following counsel of record or parties pro se in this cause **ONLY BY ELECTRONIC TRANSMISSION** to the following:

JORDAN D. WATSON (BPR #038242)  
CARR ALLISON  
736 Market Street, Suite 1320  
Chattanooga, Tennessee 37402  
Attorney for Defendant, Western World Insurance Group

This, the 3rd day of May 2023

**/s/Drayton D. Berkley**  
**Drayton D. Berkley**